

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of)

IP-Enabled Services)

E911 Requirements for IP-Enabled
Service Providers)

WC Docket No. 05-196

**SUBSCRIBER ACKNOWLEDGEMENT REPORT (SEPTEMBER 1, 2005) OF
PC CONNECTION, INC.**

PC Connection, Inc. ("PCC") submits this Subscriber Acknowledgment Report pursuant to the Public Notice issued by the Enforcement Bureau on August 26, 2005 (DA 05-2358) in WC Docket No. 05-196. This Report supplements PCC's August 10, 2005 Subscriber Acknowledgement Report.

1. Notification and Acknowledgement

As of the date of this filing, PCC has used the following methods to inform existing users of its "IP Connection" service of the limitations on the service's 911/E911 capabilities:

- *First*, as described in PCC's August 10 Report, all subscribers to the "IP Connection" service are subject to the terms of a subscriber agreement that clearly describes the limits on 911 and E911 dialing under the service. The relevant terms of the subscriber agreement are set forth in PCC's August 10 Report.
- *Second*, on August 23, 2005, PCC sent a letter regarding 911/E911 limitations to all users of its service for whom PCC had a physical address.¹ The letter, like the subscriber

¹ In order to make calls to the PSTN, users of the service must open an account and make a payment to PCC. However, some users of the service have not actively "subscribed" to it in this manner; rather, they use it solely to make IP-to-IP calls without ever setting up an account with (or making a payment to) PCC. Out of an abundance of caution, PCC included these non-subscriber users in its E911 notification efforts. However, because such users are

agreement, contained a notification that the service does not support traditional 911 or E911 access to emergency services and that subscribers therefore should use an alternate method of dialing 911. PCC asked in the letter that the subscriber share this information with anyone who might use the IP Connection service. With the letter, PCC enclosed a reprint of the portion of the subscriber agreement pertaining to 911/E911 as well as warning stickers for every phone or terminal adapter purchased by that subscriber with instructions to place the stickers on the equipment used for the service. The letter included an acknowledgment form, which PCC asked the recipient to sign and return by August 29, 2005 to avoid a suspension of service.

- *Third*, PCC simultaneously sent an email concerning the 911/E911 limitations of the service to all users of the service that had previously provided an email address to PCC. PCC asked all recipients of the email to acknowledge by return email that they had read and understood the 911/E911 limitations of the service. PCC later re-sent the same email to the same set of users.
- *Fourth*, PCC describes the 911/E911 limitations of the service under the “Frequently Asked Questions” portion of its website, at <http://www.ipconnection.biz/faqs.htm>.

PCC has temporarily ceased offering its IP Connection service to new customers but plans to resume offering the service to new customers within the next several weeks.

2. Status

As of this filing, PCC has received affirmative acknowledgements from approximately 30% of its subscribers.² PCC has stored the records of these

not “permit[ted] . . . generally to receive calls that originate on the [PSTN] and to terminate calls to the [PSTN],” *E911 Order* ¶ 24, PCC does not consider them to be “subscribers” for purposes of the Bureau’s Notice.

² As noted, this figure does not include acknowledgements received from users of the service who have not subscribed to the service for the purpose of making calls to, or receiving calls from, the PSTN.

acknowledgements within its legal department. PCC expects that by September 28, 2005, it will have received acknowledgements from approximately 80% of its subscribers.

3. Suspension of Service

PCC is not presently aware of a technical means by which it could use a “soft” or “warm” disconnect as described in the Bureau’s Notice, but it continues to study this issue. In light of the capabilities of its system and the Commission’s directives, PCC plans to suspend all service to those subscribers who have not returned affirmative acknowledgements regarding the 911/E911 limitations by September 28, 2005. PCC will promptly return service to these subscribers when it receives affirmative acknowledgements from them.

Respectfully submitted,

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September 1, 2005

Certificate of Service

I, Mary Beth Caswell, do hereby certify that true and accurate copies of the foregoing Subscriber Notification Report of PC Connection, Inc. were served this 1st day of September, 2005, upon:

Marlene Dortch, Secretary (via electronic filing)
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